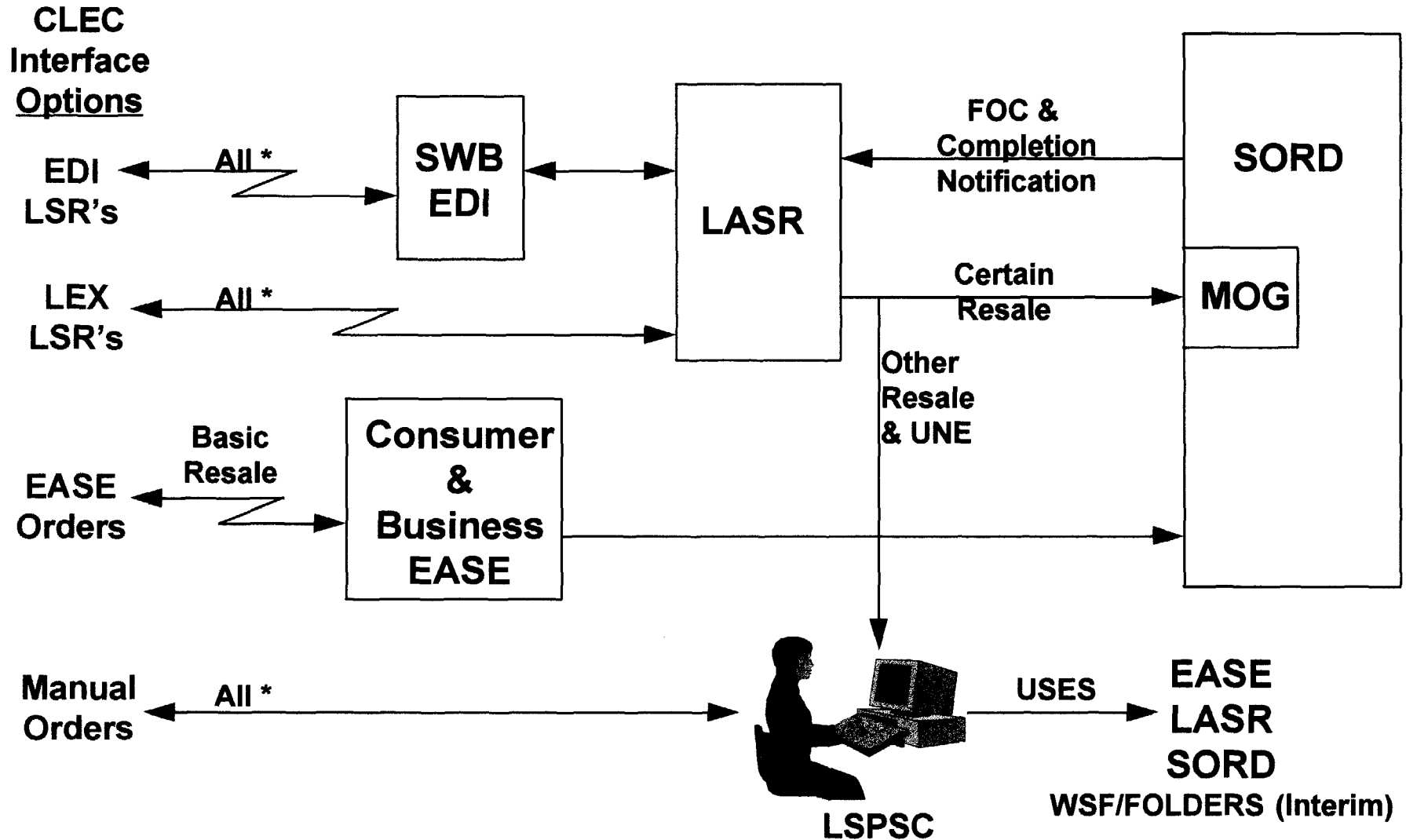


# CLEC Ordering Options System Flows



\* NOTE: Denotes all types of orders Resale & UNE

Southwestern Bell Telephone Access to Operations Support Systems Functions

Electronic  
Access  
Methods

Remote Access  
Facility (RAF)  
(Secured Connectivity)

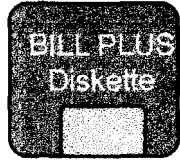
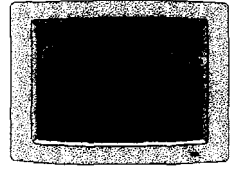
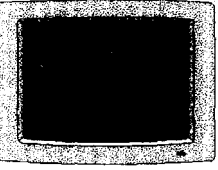
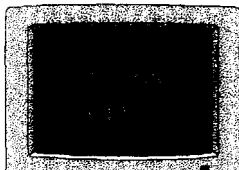
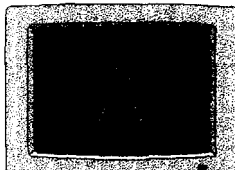
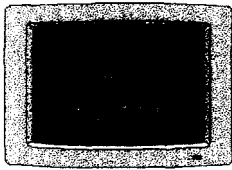
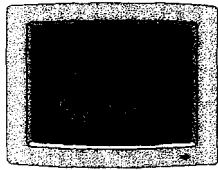
Pre-ordering

Ordering

Billing

Repair/Maintenance

SWBT Customer Service Interfaces



Via:

Dial-up  
(Modem)

Negotiated Interfaces in Advance of Industry Standards

DATA GATE  
Query System

EDI\* (OBF-LSR)  
Resale / UNE

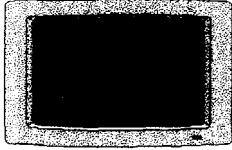
EDI\* CRIS-Resale  
CABS-UNE

And / Or

Direct  
Connection

Industry Standardized Interfaces

UNIX\* (OBF-ASR)  
Interconnection

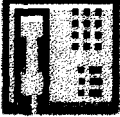


EMR\* (Exchange  
Message Record)

EB\* (Electronic  
Bonding T1M1)

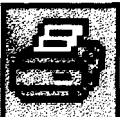
\* Access via RAF is not required for secured interfaces.

Manual Access to Functions



Via Phone

and / or



Via Fax



RAF Help Desk



LSP Service Center



LSP Service Center



LSP Service Center



LSP Repair Center

## **ATTACHMENT B**

# **SUMMARY OF SWBT ELECTRONIC INTERFACES**

**INCLUDES PHYSICAL INTERFACE,  
HARDWARE / SOFTWARE  
REQUIREMENTS AND HOURS OF  
OPERATION FOR EACH APPLICATION**

**Requirements for Access to Southwestern Bell OSS Functions**  
3/28/97

Attachment B

System/Function	Access via Remote Access Facility	Hardware Requirements	Software Requirements	Hours of Operation (Monday thru Friday) **	Hours of Operation (Saturday) **	Hours of Operation (Sunday) **
<b>PREF-ORDERING:</b>						
<b>DataGate</b> (Resale and UNE)	Yes	Personal Computer, UNIX, Tandem, MVS	PC OS - OS/2, Windows 3.11, Win 95, Win NT, Winsock 1.1 compliant TCP package; UNIX OS - Pyramid, HP, AIX, Sun Solaris, TCP; Tandem Guardian OS, TCP; DataGate client distribution for appropriate platform	7:00am - midnight	7:00am - 11:00pm	10:00am - 11:00pm
<b>Verigate</b> (Resale and UNE)	Yes	Personal Computer (486 or above); Modem (14.4 bps or above)	DOS (Version 5.0 or above); Windows 3.1, 3.11, Windows 95, Windows using OS/2; WINSOCK compliant TCP package (e.g., Microsoft TCP stack) (if private line circuit is used)	6:00am - 10:00pm	7:00am - 6:00pm (except for Channel Inquiry)	none
<b>EASE</b> (Residence Resale)	Yes	3270 terminal for private line connection, or for dial-up connections, a Personal Computer with 3270 terminal emulation network connectivity to SWB's network	TN 3270 terminal emulation software, TCP/IP	7:00am - midnight	7:00am - 11:00pm	10:00am - 11:00pm
<b>EASE</b> (Business Resale)	Yes	Personal Computer (Pentium); Modem (28.8 bps or above)	SWB application software running over OS/2 operating system, TCP/IP	7:00am - midnight	7:00am - 11:00pm	10:00am - 11:00 pm
<b>ORDERING/PROVISIONING:</b>						
<b>EASE</b> (Residence Resale)		(See previous information)				
<b>EASE</b> (Business Resale)		(See previous information)				
<b>EDI Ordering Gateway</b> (Resale and UNE)	Not required but could be used	Modem / line	Communications Software, i.e., frame relay. EDI translation package, i.e., GENTRAN. EDI transaction types supported: 850, 860, 855, 865, 997.	7 x 24	7 x 24	9:00am - midnight
<b>LEX</b> (Resale and UNE)	Yes	Personal Computer (486 or above); Modem (14.4 bps or above)	DOS (Version 5.0 or above); Windows 3.1, 3.11, Windows 95, Windows using OS/2; WINSOCK compliant TCP package (e.g., Microsoft TCP stack) (if private line circuit is used)	(Planned) 7:00am - 8:00pm	(Planned) 7:00am - 8:00pm	(Planned) 9:00am - 6:00pm
<b>Southwestern Bell Toolbar / Order Status</b> (Resale and UNE)	Yes	Personal Computer (486 or above); Modem (14.4 bps or above)	DOS (Version 5.0 or above); Windows 3.1, 3.11, Windows 95, Windows using OS/2; WINSOCK compliant TCP package (e.g., Microsoft TCP stack) (if private line circuit is used)	6:00am - 11:30pm	7:00am - 6:00pm	none

**Requirements for Access to Southwestern Bell OSS Functions**  
3/28/97

Attachment B

System/Function	Access via Remote Access Facility	Hardware Requirements	Software Requirements	Hours of Operation (Monday thru Friday) **	Hours of Operation (Saturday) **	Hours of Operation (Sunday) **
<b>REPAIR AND MAINTENANCE:</b>						
Southwestern Bell Toolbar / Trouble Administration	Yes	Personal Computer (486 or above); Modem (14.4 bps or above)	DOS (Version 5.0 or above); Windows 3.1, 3.11, Windows 95, Windows using OS/2; WINSOCK compliant TCP package (e.g., Microsoft TCP stack) (if private line circuit is used)	4:00am - 10:00pm	5:00am - 9:00pm	5:00am - 9:00pm
Electronic Bonding Interface	No	Mid-range Server (for EB gateway)	UNIX operating system; CMIP protocol; LSPs build software interface between their OSSs and the CMIP protocol which adheres to the Open Systems Interconnect (OSI) data communications standards and the ANSI T1M1, T1M1.5, T1.227 and T1.228 standards	3:00am - midnight	3:00am - 10:00pm	4:30am - midnight
<b>BILLING:</b>						
Customer Network Administration / Billing Inquiry (Resale and UNE)	Yes	Personal Computer (486 or above); Modem (14.4 bps or above)	DOS (Version 5.0 or above); Windows 3.1, 3.11, Windows 95, Windows using OS/2; WINSOCK compliant TCP package (e.g., Microsoft TCP stack) (if private line circuit is used)	7:00am - midnight	7:00am - 11:00pm	10:00am - 11:00pm
Bill Plus (sm) (Resale)	No	Personal Computer ranging from a System 486, Memory 8MB, CD-ROM 2X to a Pentium 144 MHz, Memory 32MB, CD-ROM 6X. Size depends on volume of calls per month and amount of Account Service Information that will be received.	Windows 3.1 or better, VGA monitor, MB disk space, Microsoft compatible mouse.	Per Bill Period		
Usage Extract Feed (Resale and UNE)	No	EBCIDIC compatible. Based on selected transmission: 9TRK - 9 TRK Tape Drive, 18TRK - 18TRK Tape Drive, Direct:connect - private circuit, TCP/IP - Internet or RAS access	Direct:Connect option requires Direct:Connect software, TCP/IP option needs TCP/IP	Daily Feed		
Electronic Data Interchange Billing (EDIB) (Resale and UNE)	No	Modem / line	Communications Software, i.e., frame relay. EDI translation package, i.e., GENTRAN. EDI transaction types supported: 811, 864, 997.	Per Bill Period		
** Hours of operation listed are generally the same as SWBT provides to itself and are subject to change or consideration as business needs dictate.						

## ATTACHMENT C

# SWBT DEMONSTRATIONS OF ELECTRONIC INTERFACES

## ATTACHMENT C

April 1997

### SWBT ELECTRONIC INTERFACES DEMONSTRATIONS

In an effort to provide clear understanding of the functions associated with access to our operations support systems, SWBT provides live demonstrations of system applications. To date, we have performed the following demonstrations.

CLEC NAME	DATE OF DEMO	FUNCTION/ APPLICATION
ALTEL	MARCH 1997	ALL
AT&T	JANUARY 1997	ORDERING/BUS & RES EASE
AT&T	MARCH 1997	TROUBLE ADMINISTRATION
CAPROCK	MARCH 1997	ALL
E Z TALK	NOVEMBER 1996	ORDERING/BUS & RES EASE
ICG	APRIL 1997	ALL
MCI	MARCH 1997	ALL
TX COMM SOUTH	NOVEMBER 1996	ORDERING/BUS & RES EASE
SPRINT	FEBRUARY 1997	ORDERING/BUS & RES EASE
USA EXCHANGE	MARCH 1997	ALL

**NOTE:** A complete (ALL) demonstration includes the following functions and applications:

#### **PRE-ORDER**

Datagate  
Verigate

#### **MAINTENANCE/ REPAIR**

Trouble Administration

#### **ORDER/PROVISIONING**

Residential EASE  
Business EASE  
EDI  
LEX  
Order Status

#### **BILLING**

Billing Inquiry  
BILL PLUS\*  
Usage Extract

## ATTACHMENT D

# SWBT TRAINING CLASS SCHEDULE OF ELECTRONIC INTERFACES



**ATTACHMENT D**

April 1997

**SWBT TRAINING CLASS SCHEDULE OF ELECTRONIC INTERFACES**

<b>CLEC NAME</b>	<b>TRAINIG DATES</b>	<b>FUNCTION/ APPLICATION</b>
AMERICAN TELCO	JUNE 9-13, 1997	RESIDENCE EASE, ORDER STATUS, VERIGATE AND TROUBLE ADMINISTRATION
AT&T	JANUARY 27-31, 1997	RESIDENCE EASE
AT&T	APRIL 14-18, 1997	RESIDENCE EASE, ORDER STATUS, VERIGATE AND TROUBLE ADMINISTRATION
CAPROCK	MAY 12-16, 1997 (tentative)	RESIDENCE EASE
EZ TALK	JANUARY 6-8, 1997	RESIDENCE EASE (beta test 1)
EZ TALK	MAY 5-9, 1997 (tentative)	RESIDENCE EASE
TEXAS COMM SOUTH	JANUARY 22-24, 1997	RESIDENCE EASE (beta test 2)
TEXAS COMM SOUTH	MARCH 19-20, 1997	RESIDENCE EASE (completion)
VALU-LINE OF KANSAS	APRIL 7-11, 1997	RESIDENCE EASE, ORDER STATUS, VERIGATE AND TROUBLE ADMINISTRATION
VALU-LINE OF KANSAS	APRIL 28- MAY 2, 1997 (tentative)	BUSINESS EASE
WESTERN OKLAHOMA LONG DISTANCE	FEBRUARY 24-28, 1997	RESIDENCE EASE
WESTERN OKLAHOMA LONG DISTANCE	MARCH 3-7, 1997	BUSINESS EASE

## ATTACHMENT E

# SWBT SAMPLE FORECAST LETTER

## SWBT Sample Forecast Letter

March, 1997

«M» «FirstName» «LastName»  
«Title»  
«Company»  
«Address1»  
«Address2»  
«City» «State» «ZipCode»

Dear «M» «LastName»:

As you know, the Telecommunications Act of 1996 ("96 Act") imposes upon Southwestern Bell Telephone Company ("SWBT") an obligation to provide access to unbundled network elements and to offer for resale its retail services. In addition, the Federal Communications Commission has concluded that incumbent local exchange carriers must provide nondiscriminatory access to operations support systems functions for pre-ordering, ordering, provisioning, maintenance and repair, and billing of unbundled network elements and resold services that is at least equivalent to that it provides to itself, its customers, or other carriers. SWBT has worked diligently to meet these requirements and to position itself to honor the contractual obligations contained in its interconnection agreements.

SWBT has set up two centers within its wholesale operations to meet the needs of competitive local exchange carriers ("CLECs"). The Local Service Provider Service Center is the CLECs' single point of contact for purposes of ordering, provisioning, and billing for interconnection, resold services, and unbundled network elements. The Local Service Provider Center serves a similar function for provisioning, turn-up, and acceptance testing of all interconnection facilities and unbundled network elements, and for the receipt of trouble reports and performance of maintenance on all resold plain old telephone services, interconnection facilities, and unbundled network elements. In addition, SWBT has made available to CLECs the same electronic interfaces to its operations support systems ("OSS") that SWBT itself utilizes. Moreover, SWBT has developed several new choices of electronic access to its OSS especially for use by CLECs, beyond those that SWBT and its customers use today.

SWBT is acutely aware that it must process and provision orders from CLECs for resold services and unbundled network elements on a parity basis. In sizing its wholesale operations and OSS to meet the needs of CLECs, SWBT has largely relied upon publicly available information and its own experience in provisioning local exchange services. SWBT has increased its OSS capacity for those interfaces and systems in operation before the '96 Act was passed, and has built-in

## Attachment E

enough capacity for the new interfaces and systems to meet its own initial estimates of CLEC order volumes.

However, SWBT wants to ensure that the investment in and size of its wholesale operations and that its OSS capacity best corresponds with its CLEC customers' actual needs. Accordingly, please provide SWBT, as soon as possible, with written estimates of the order volumes that your company expects to submit over the rest of 1997, 1998, and 1999, as well as some other pertinent information.

In addition, as soon as possible, please provide SWBT a written estimate of the quantity of interconnection, resold services, and unbundled network elements that your company expects to order in 1997 through 1999, utilizing the attached worksheet.

Once your company has determined which, if any, SWBT electronic interfaces it will utilize, more detailed forecast information specific to those interfaces will be required from your company in order to fine-tune the preliminary sizing forecasts and to determine the appropriate network connections.

Please provide your company's responses to «Account». If you have any questions concerning this request, you may contact me or simply have your staff contact «Account» at «Number». Thank you in advance for your assistance.

Sincerely yours,

Attachment

cc: «Account»

### LOCAL SERVICE PROVIDER FORECAST

**LSP Name:** \_\_\_\_\_

**Contact:** \_\_\_\_\_

**Contact Telephone:** \_\_\_\_\_

**Southwestern Bell Telephone Company**

**Contact:** \_\_\_\_\_

**Contact Telephone:** \_\_\_\_\_

[illegible]

**LOCAL SERVICE PROVIDER FORECAST**

**LSP Name:** \_\_\_\_\_  
**Contact:** \_\_\_\_\_  
**Contact Telephone:** \_\_\_\_\_

**Contact:** Southwestern Bell Telephone Company  
**Contact Telephone:** \_\_\_\_\_

	<i>Arkansas</i>			<i>Kansas</i>			<i>Missouri</i>			<i>Oklahoma</i>			<i>Texas</i>		
	<i>1997</i>	<i>1998</i>	<i>1999</i>	<i>1997</i>	<i>1998</i>	<i>1999</i>	<i>1997</i>	<i>1998</i>	<i>1999</i>	<i>1997</i>	<i>1998</i>	<i>1999</i>	<i>1997</i>	<i>1998</i>	<i>1999</i>
<u><i>Resale</i></u>															
<i>Business - Simple</i>															
<i>Business - Complex</i>															
<i>Residence</i>															
<u><i>Interconnection</i></u>															
<i>Trunks</i>															
<i>Signaling</i>															
<u><i>Manual Orders</i></u>															
<i>Resale</i>															
<i>Unbundled Elements</i>															
<u><i>Electronic Orders</i></u>															
<i>Resale</i>															
<i>Unbundled Elements</i>															
<u><i>Employees with Access</i></u>															
<i>Ordering</i>															
<i>Maintenance</i>															

TYPE OF ELECTRONIC INTERFACE BY STATE:

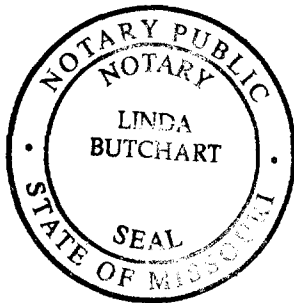
ADDITIONAL COMMENTS:

NOTES: Quantities should reflect anticipated order activity occurring in each quarter/year.

The information contained in this affidavit is true and correct to the best of my knowledge and belief.

Elizabeth A. Ham  
Elizabeth A. Ham

Subscribed and sworn to before me this 7<sup>th</sup> day of April, 1997.



Linda Butchart  
NOTARY PUBLIC

LINDA BUTCHART  
NOTARY PUBLIC STATE OF MISSOURI  
ST. LOUIS COUNTY  
MY COMMISSION EXP NOV 19, 1998

My commission expires:

11-19-98





BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

In the matter of  Application of SBC Communications Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc., d/b/a Southwestern Bell Long Distance, Pursuant to Section 271 of the Telecommunications Act of 1996 to Provide In-Region Originating, InterLATA Services in Oklahoma	CC Docket No. _____
--	---------------------

**AFFIDAVIT OF ELIZABETH A. HAM  
ON BEHALF OF SOUTHWESTERN BELL TELEPHONE COMPANY**

STATE OF                                 )  
  ) ss.  
COUNTY OF                             )

I, Elizabeth A. Ham, being first duly sworn upon oath, do hereby depose and state as follows:

**A.     AFFIANT'S BACKGROUND AND DUTIES**

1.     My name is Elizabeth A. Ham. I am Executive Director -- Interconnection & Resale, Technical Implementation for Southwestern Bell Telephone Company ("SWBT"), a wholly owned subsidiary of SBC Communications Inc. ("SBC"). SWBT is a "Bell operating company" ("BOC"), as defined in Section 3(4) of the Communications Act of 1934, as amended by the Telecommunications Act of 1996 ("the 1996 Act"). SWBT is an incumbent local exchange carrier within its operating areas in Oklahoma. Southwestern Bell Communications Services, Inc., d/b/a Southwestern Bell Long distance ("SBLD"), is an affiliate through which SBC will provide in-region interLATA services under the 1996 Act.<sup>1</sup>

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<sup>1</sup>All references that I make in this Affidavit to the Communications Act of 1934, as amended by the Telecommunications Act of 1996, shall be made as "Section \_\_\_\_."

2. In my current position I am responsible for the development of procedures which are used by SWBT personnel to process Competing Local Exchange Carriers ("CLEC") service requests and for assisting the Customer Services organization in the implementation of CLEC contracts in a manner consistent with State commission and Federal Communications Commission ("FCC" or "Commission") rules and regulations governing local exchange competition. In my most recent position, I have led a multidisciplinary team in the development of access to SWBT's Operations Support System ("OSS") functions. I also represent our Customer Services organization in negotiations with CLECs.
3. I received a bachelor of science degree in 1973 from Arkansas Polytechnic University in Russellville, Arkansas. I have 26 years experience with SWBT. I have held numerous jobs in our Operator Services, Network Operations and Customer Services organizations. I was selected by SWBT to receive extensive training in Statistical Process Improvement methods, and I am one of our company's internal quality consultants.

**B. PURPOSE OF AFFIDAVIT**

This affidavit demonstrates that SWBT will comply with the separate affiliate rules of Section 272 of the 1996 Act and with the FCC's rules implementing that Section in its relationship with SBLD or with any other SBC Section 272 affiliate that carries out the authorization requested in this Application.<sup>2</sup> This affidavit also demonstrates that SWBT will comply with the separate affiliate

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<sup>2</sup>See In the Matter of Implementation of the Non-Accounting Safeguards of Sections 271 and 272 of the Communications Act of 1934, as amended, First Report and Order, CC Docket No. 96-149, FCC 96-489 (rel. Dec. 24, 1996) ("Non-Accounting Safeguards First Report and

rules of Section 272 of the 1996 Act and with the FCC's rules implementing that Section in its relationship with Pacific Bell Communications, Inc. ("PBCOM").

**C. SWBT IS A "SEPARATE AFFILIATE" AND WILL "OPERATE INDEPENDENTLY" FROM SBCS**

**1. SWBT IS A SEPARATE AFFILIATE FROM SBLD and PBCOM**

- a. SWBT is a completely "separate affiliate" from SBLD and from PBCOM. SWBT is a corporation organized under the laws of the State of Missouri and is a wholly-owned subsidiary of SBC. SWBT owns stock of neither SBLD nor PBCOM; correspondingly, neither SBLD nor PBCOM owns stock of SWBT.
- b. SWBT provides the following telecommunications services in the States of Texas, Oklahoma, Arkansas, Kansas and Missouri:
  - i. telephone exchange service;
  - ii. intraLATA telephone toll service;
  - iii. exchange access service;
  - iv. resold local exchange services and unbundled network elements;
  - v. operator services;
  - vi. certain other regulated and non-regulated services related to the provision of telecommunications.

**2. SBLD AND PBCOM WILL "OPERATE INDEPENDENTLY" FROM SWBT**

- a. SBLD Will Operate Independently From SWBT
  - i. SWBT and SBLD do not and, as long as the requirements of Section 272 and the applicable regulations remain in effect, will not jointly own

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**Order"); In the Matter of Implementation of the Telecommunications Act of 1996: Accounting Safeguards Under the Telecommunications Act of 1996, Report and Order (rel. Dec. 24, 1996) ("Accounting Safeguards Report and Order"). Applicants reserve their rights with regard to the filing of a petition for review with a court of competent jurisdiction.**

telecommunications transmission and switching facilities or the land and buildings on which such facilities are located.

- ii. SBLD is not currently providing to SWBT, and as long as the requirements of Section 272 or any lawful regulations remain applicable, SWBT will not accept from SBLD, operating, installation, or maintenance services in connection with SWBT's switching and transmission facilities, although SWBT may obtain such services from SBLD in the event SWBT purchases sophisticated equipment from SBLD within the meaning of paragraph 164 of the Non-Accounting Safeguards First Report and Order. SWBT has no existing plan to purchase such equipment from SBLD or to have SBLD install or maintain such equipment for SWBT.
- iii. As long as the requirements of Section 272 or any lawful regulations remain applicable, neither SWBT nor any SWBT affiliate, other than a Section 272 affiliate, will perform operating, installation, or maintenance functions associated with the switching or transmission facilities that SBLD owns or leases from provider other than SWBT.
- iv. Prior to the issuance of the Non-Accounting Safeguards First Report and Order, SBLD had expressed its intention to purchase services from SWBT in conformity with the express applicable structural, transactional, and non-discriminatory treatment requirements of Section 272.
- v. In reliance upon the express terms of Section 272, SBLD contracted with SWBT to receive, and has received on an as-needed basis, certain services as specified in the SWBT Cost Allocation Manual or set forth in SWBT's

- tariffs. A listing of those services that SBLD has actually obtained from SWBT is set out in the Affidavits of Kathleen Larkin and Karol Sweitzer.
- vi. SWBT will not provide any services that constitute “operations, installation, or maintenance” functions in connection with the switching or transmission facilities of SBLD. Since the entry of the Non-Accounting Safeguards First Report and Order, SWBT has undertaken to identify and discontinue, subject to any reconsideration by the FCC or by appellate courts, services provided to SBLD that constitute “operations, installation, or maintenance” functions in connection with the switching or transmission facilities of SBLD.
- vii. SWBT-Provided Services that do not constitute prohibited operations, installation, or maintenance, but instead are administrative services, may be obtained from a shared services affiliate. If SWBT continues to provide administrative services to SBLD, these services will be provided to SBLD on non-discriminatory rates, terms, and conditions that are available to similarly-situated non-affiliates. In addition, either SWBT or a shared services affiliate may provide joint marketing services to SBLD without regard to whether those services are available to non-affiliates.
- viii. SBLD may negotiate with SWBT on an arms-length basis to obtain transmission and switching facilities from SWBT, to arrange for collocation of facilities, or to provide or to obtain services other than those described above or expressly prohibited in the Non-Accounting Safeguards First Report and Order. SBLD and SWBT will account for any affiliate transaction between SBLD and SWBT in accordance with the rules

adopted by the FCC in the Accounting Safeguards Report and Order, as discussed in the Affidavit of Kathleen Larkin.

- ix. SBLD presently has four interexchange switches sited on leased SWBT premises. These switches are not currently interconnected with SWBT exchange access facilities. On September 27, 1996, SWBT offered comparable leasing arrangements in writing to SBLD's future competitors on non-discriminatory terms and conditions.

b. PBCOM Will Operate Independently From SWBT

Although the "requested authorization" in this application will not be carried out by PBCOM, the following facts are true about the relationship between SWBT and PBCOM:

- i. SWBT and PBCOM do not and, as long as the requirements of Section 272 and the applicable regulations remain in effect, will not jointly own telecommunications transmission and switching facilities or the land and buildings on which such facilities are located.
- ii. PBCOM is not currently providing to SWBT, and as long as the requirements of Section 272 or any lawful regulations remain applicable, SWBT will not accept from PBCOM, operating, installation, or maintenance services in connection with SWBT's switching and transmission facilities, although SWBT may obtain such services from PBCOM in the event SWBT purchases sophisticated equipment from PBCOM within the meaning of paragraph 164 of the Non-Accounting Safeguards First Report and Order. SWBT has no existing plan to

purchase such equipment from PBCOM or to have PBCOM install or maintain such equipment for SWBT.

- iii. As long as the requirements of Section 272 or any lawful regulations remain applicable, neither SWBT nor any SWBT affiliate, other than a Section 272 affiliate, will perform operating, installation, or maintenance functions associated with the switching or transmission facilities that PBCOM owns or leases from provider other than SWBT.

**D. SWBT COMPLIES WITH THE SEPARATE OFFICERS, DIRECTORS, AND EMPLOYEES REQUIREMENTS OF THE ACT**

**1. SWBT/SBLD**

- a. No officer of SWBT will be an officer of SBLD, and as long as the applicable requirements of Section 272 remain, no officer of SWBT will simultaneously serve as an officer of SBLD.
- b. No director of SWBT will be a director of SBLD, and as long as the applicable requirements of Section 272 remain, no director of SWBT will also simultaneously serve as a director of SBLD.
- c. No SWBT employee will be an employee of SBLD, and as long as the applicable requirements of Section 272 remain, no employee of SWBT will simultaneously be employed by SBLD.

**2. SWBT/PBCOM**

- a. No officer of SWBT will be an officer of PBCOM, and as long as the applicable requirements of Section 272 remain, no officer of SWBT will simultaneously serve as an officer of PBCOM.

- b. No director of SWBT will be a director of PBCOM, and as long as the applicable requirements of Section 272 remain, no director of SWBT will also simultaneously serve as a director of PBCOM.
- c. No SWBT employee will be an employee of PBCOM, and as long as the applicable requirements of Section 272 remain, no employee of SWBT will simultaneously be employed by PBCOM.

**E. SWBT WILL COMPLY WITH APPLICABLE NONDISCRIMINATION SAFEGUARDS**

**1. SWBT WILL PROVIDE AND PROCURE GOODS, SERVICES, FACILITIES, AND INFORMATION, AND WILL ESTABLISH OR COOPERATE IN THE ESTABLISHMENT OF STANDARDS, IN A NONDISCRIMINATORY MANNER**

**a. SWBT/SBLD**

- i. SWBT will not discriminate in favor of its Section 272 affiliates in the provision or procurement of goods, services, facilities, and information or in the establishment of standards. While the 1996 Act and applicable FCC rules permit joint marketing on a discriminatory basis, SWBT will provide any joint marketing services to SBLD on a compensatory basis that complies with the arms-length requirements of the 1996 Act. SWBT will make available to unaffiliated entities all other non-joint-marketing goods, services, facilities, and information that SWBT provides to SBLD as Section 272 requires and as ordered in the Non-Accounting Safeguards First Report and Order. Non-joint-marketing related goods, services, facilities, and information will be made available to unaffiliated entities at the same rates, and on the same terms and conditions, as are provided to SBLD. Where SWBT offers services or facilities on a tariffed basis, they



will be provided to SBLD at the same rates, and on the same terms and conditions, as are available to nonaffiliated entities under the applicable tariffs.

- ii. As I previously stated, if SWBT continues to provide administrative, non-joint-marketing services to SBLD, these services will be provided to SBLD on non-discriminatory rates, terms, and conditions that are available to similarly-situated non-affiliates. Either SWBT or a shared services affiliate may provide joint marketing services to SBLD without regard to whether those services are available to non-affiliates.
- iii. SBLD may negotiate with SWBT on an arm's-length basis to obtain transmission and switching facilities from SWBT, to arrange for collocation of facilities, or to provide or to obtain administrative services (services other than joint marketing services or "operating, installation, or maintenance" services in connection with SBLD's switching or transmission facilities).
- iv. SWBT will provide unaffiliated carriers with the same exchange access, interconnection, collocation, unbundled network elements, and resold services that are provided to SBLD on non-discriminatory rates, terms, and conditions. SWBT will provide telecommunications services and network elements to SBLD using the same service parameters, interfaces, intervals, standards, procedures, and practices used to serve other carriers and retail customers.